

# **Exhibit D**

**From:** [compliancemgr@godaddy.com](mailto:compliancemgr@godaddy.com)  
**To:** [Luetkemeyer, Lucinda](mailto:Luetkemeyer, Lucinda)  
**Cc:** [Teske, Erin](mailto:Teske, Erin); [Harmon, Mark](mailto:Harmon, Mark); [Greim, Edward D.](mailto:Greim, Edward D.); [Donnelli, Jennifer](mailto:Donnelli, Jennifer)  
**Subject:** RE: Urgent: Motion to quash subpoena  
**Date:** Friday, December 20, 2019 5:20:30 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Thank you for your email and clarification. Unless we receive a copy of a filed motion to quash by 4pm (MST) on 23 December 2019, we will send our production out that evening.

Regards,

**K. Groff**  
Admin-Legal II



480.624.2546 (F)  
[compliancemgr@godaddy.com](mailto:compliancemgr@godaddy.com)

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**From:** Luetkemeyer, Lucinda <LLuetkemeyer@gravesgarrett.com>  
**Sent:** Friday, December 20, 2019 4:11 PM  
**To:** compliancemgr <compliancemgr@godaddy.com>  
**Cc:** Teske, Erin <ETeske@hodgsonruss.com>; Harmon, Mark <MHarmon@hodgsonruss.com>; Greim, Edward D. <EDGreim@gravesgarrett.com>; Donnelli, Jennifer <JDonnelli@gravesgarrett.com>  
**Subject:** RE: Urgent: Motion to quash subpoena

Notice: This email is from an external sender.

RE: Civil Action No. 1:18-cv-02185-JGK.

Mr. Groff,

No motion to quash these two GoDaddy subpoenas has been filed with the Court. No order quashing the subpoenas has been entered.

Instead, during a phone conference set for a different purpose on November 8, objecting counsel raised the issue of three *different* subpoenas before the Judge, who said (of those) that she was “not sure that these matters are fully submitted as motions to quash,” but gave objecting counsel permission to notify those three subpoena recipients —“AT&T and T-Mobile and Google” “that the court has asked that they withhold production” until a ruling. No objections have ever been raised in writing or otherwise

with the Court related to these GoDaddy subpoenas.

Please advise if you have any questions. Counsel for the party that sent you an objection yesterday is copied here.

Thank you,

Lucinda Luetkemeyer

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**From:** Teske, Erin <ETeske@hodgsonruss.com>  
**Sent:** Friday, December 20, 2019 9:46 AM  
**To:** compliancemgr@godaddy.com  
**Cc:** Greim, Edward D. <EDGreim@gravesgarrett.com>; Harmon, Mark <MHarmon@hodgsonruss.com>  
**Subject:** RE: Urgent: Motion to quash subpoena

Dear Mr. Groff,

In connection with a motion addressed to other subpoenas seeking personal information, Judge Freeman has been clear that outstanding subpoenas served by Strategic seeking such information in connection with the action *Eastern Profit Corporation Limited v. Strategic Vision* in the Southern District of New York, Civil Action No. 1:18-cv-02185-JGK are to be held in abeyance pending further notice from the Court. Thus, I request that GoDaddy withhold production of any documents responsive to the Subpoena until further notice of the Court.

I am copying counsel for Strategic on this email.

**Erin N. Teske**  
Hodgson Russ LLP  
Tel: 646.218.7517  
Fax: 646.218.7690

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**From:** [compliancemgr@godaddy.com](mailto:compliancemgr@godaddy.com) <[compliancemgr@godaddy.com](mailto:compliancemgr@godaddy.com)>  
**Sent:** Thursday, December 19, 2019 6:27 PM  
**To:** Teske, Erin <[ETeske@hodgsonruss.com](mailto:ETeske@hodgsonruss.com)>  
**Subject:** RE: Urgent: Motion to quash subpoena

Thank you for your email. Please reply to this email with a copy of the Motion to Quash and any decision by 4pm (MST) tomorrow 20 December 2019.

Regards,

**K. Groff**  
Admin-Legal II



480.624.2546 (F)  
[compliancemgr@godaddy.com](mailto:compliancemgr@godaddy.com)

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**From:** Teske, Erin <[ETeske@hodgsonruss.com](mailto:ETeske@hodgsonruss.com)>  
**Sent:** Thursday, December 19, 2019 10:35 AM  
**To:** compliancemgr <[compliancemgr@godaddy.com](mailto:compliancemgr@godaddy.com)>  
**Subject:** Urgent: Motion to quash subpoena

Notice: This email is from an external sender.

Dear Subpoena Compliance Department:

I am writing in connection with a subpoena served upon GoDaddy by Strategic Vision US, LLC ("Strategic") in connection with the action, *Eastern Profit Corporation Limited v. Strategic Vision* in the Southern District of New York, Civil Action No. 1:18-cv-02185-JGK.

My firm represents one of the non-parties whose information may be produced in response to the subpoena. We have filed a request to quash the subpoena via letter to Judge Freeman in accordance with her rules, and **Judge Freeman has directed that the subpoena be held in abeyance** until further notice.

We respectfully request that you do not provide Strategic with the requested information until Judge Freeman has determined whether any aspect of the subpoena is proper.

I ask that you please confirm receipt of this email and let me know whether I need to direct this request to any other department, as time is of the essence.

Kind regards,

**Erin N. Teske**  
Hodgson Russ LLP

Tel: 646.218.7517  
Fax: 646.218.7690



[website](#) | [vCard](#) | [bio](#) | [email](#)

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Edward Greim



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Lucinda Luetkemeyer



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